

UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF NEW YORK

PAUL NICKLEN,

Plaintiff,

Case 1:20-cv-10300-JSR

v.

SINCLAIR BROADCAST GROUP, INC., et. al,

Defendants.

**PLAINTIFF NICKLEN'S SECOND AMENDED
FED. R. CIV. P. 26(a)(1)(A) INITIAL DISCLOSURES**

Comes now Plaintiff Paul Nicklen, by and through the undersigned counsel, and for his Second Amended Fed. R. Civ. P. 26(a)(1)(A) Initial Disclosures, states as follows:

1. Rule 26(a)(1)(A)(i) Disclosures: Individuals Likely to Have Information Relevant to Plaintiff's Claims.

a. Knowledge of expert witnesses:

- i. Plaintiff designates Jeff Sedlik as his expert witness regarding causation of actual and/or statutory damages to Plaintiff. The substance of his expected expert testimony will be disclosed at the time and in the manner contemplated by the applicable rules and orders entered by the Court. Plaintiff plans to produce a written report and resume in advance of a deposition. Plaintiff also anticipates that this witness may rely on documents produced by the Sinclair Defendants, which have not produced any responsive documents to Plaintiff's discovery requests as of the date of this filing. Plaintiff reserves the right to amend and supplement his disclosures.

WHEREFORE, Plaintiff hereby serves his second amended Federal Rule 26(a) Initial Disclosures.

Dated: This 16th day of April 2021.

Respectfully submitted,

By: /s/ James Bartolomei Esq.

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PROOF OF SERVICE

The undersigned certifies that a copy of the foregoing instrument was served upon the attorneys of record of all parties to the above case via email at their respective business addresses as disclosed by the pleadings of record herein on the Court's ECF, on April 16, 2021. I declare under the penalty of perjury that the statement above is true to the best of my information, knowledge and belief.

By: /s/ James H. Bartolomei